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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**

14 GSI TECHNOLOGY, INC., a Delaware
15 Corporation,

16 Plaintiff,

17 v.

18 UNITED MEMORIES, INC., a Colorado
Corporation, and INTEGRATED SILICON
19 SOLUTION, Inc., a Delaware Corporation,

20 Defendants.

21 UNITED MEMORIES, INC., a Colorado
22 Corporation,

23 Counterclaim-Plaintiff,

24 v.

25 GSI TECHNOLOGY, INC., a Delaware
26 Corporation,

27 Counterclaim-Defendant.
28

Case No. 13-CV-1081-PSG

**NOTICE OF INTENT TO WITHDRAW
AND MOTION TO WITHDRAW AS
COUNSEL OF RECORD FOR
DEFENDANT UNITED MEMORIES, INC.;
~~PROPOSED~~ ORDER GRANTING
MOTION TO WITHDRAW**

Complaint: Filed March 8, 2013
Judge: Hon. Paul S. Grewal

1 **TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 PLEASE TAKE NOTICE that Constance F. Ramos, Thomas J. Kearney, and the law
3 firm of Winston & Strawn LLP hereby seek permission from the Court to withdraw as counsel
4 of record for Defendant United Memories, Inc. ("United Memories"), pursuant to Civil Local
5 Rule 11-5. United Memories understands and consents to this withdrawal.

6 Attorneys K.T. Cherian, Robert F. Ruyak, and others of the law firm RuyakCherian
7 LLP, continue to represent United Memories in this matter before the Court. Mr. Cherian has
8 been lead counsel for United Memories since the filing of this action against it in 2013.

9 Having alternative counsel, United Memories respectfully moves the Court for an order
10 granting Constance F. Ramos, Thomas J. Kearney, and the law firm of Winston & Strawn LLP
11 permission to withdraw as counsel of record in this action. This motion to withdraw is
12 permitted under the California Code of Professional Conduct Rule 3-700(C).

13 Dated: March 10, 2016

Respectfully submitted,

14 WINSTON & STRAWN LLP

15 By: /s/ Constance F. Ramos

16 Constance F. Ramos
17 Attorneys for Defendant
United Memories, Inc.

18 **~~PROPOSED~~ ORDER**

19 The Court hereby GRANTS the above motion to permit the withdrawal of Constance F.
20 Ramos, Thomas J. Kearney, and the law firm Winston & Strawn LLP as counsel of record for
21 Defendant United Memories, Inc. United Memories, Inc.'s counsel of record otherwise
22 remains unchanged.

23 IT IS SO ORDERED.

24 Dated: March 10, 2016

25 Paul S. Grewal
26 Honorable Paul S. Grewal
27 United States ~~District Court~~ Judge
28 Magistrate